

AO 91 (Rev. 11/11) Criminal Complaint

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

FILED

NOV 20 2018

CLERK, U.S. DISTRICT COURT

By

Deputy

United States of America

v.

Case No.

2:18-MJ-176

Laryssa Marie Brown (01)
David Dwight Hilliard Jr. (02)*Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 19, 2018 in the county of Potter in the
Northern District of Texas, the defendant(s) violated:*Code Section**Offense Description*Title 21, United States Code,
Sections 841(a)(1), 841(b)(1)(A)
(viii) and 846.Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams or
More of Methamphetamine.

This criminal complaint is based on these facts:

see attached affidavit in support of complaint.

☒ Continued on the attached sheet.*Complainant's signature*

Christopher Walters, DEA TFO

Printed name and title

Sworn to before me and signed in my presence.

Date:

11-20-18*Judge's signature*

City and state:

Amarillo, Texas

Lee Ann Reno, U.S. Magistrate Judge

Printed name and title

No. 2:18-MJ-176

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Christopher Walters being duly sworn, depose and state:

1. I am a Task Force Officer assigned to the Drug Enforcement Administration (DEA) in Amarillo, Texas. I have been so employed for about twenty one (21) years with the Potter County Sheriff's Office, and as part of my duties as a Task Force Officer I investigate criminal violations related to narcotics trafficking and illegal drug smuggling. I have been involved in several investigations of illegal contraband and have specialized training and knowledge in investigating the illicit smuggling, transportation, and trafficking of narcotics in violation of Title 21, United States Code, Section 841(a)(1).

2. This affidavit is made in support of a complaint and arrest warrant for Laryssa Marie BROWN and David Dwight HILLIARD JR. I am familiar with the information contained in this affidavit based upon my own personal investigation, as well as conversations with other law enforcement officers involved in this investigation.

3. On November 19, 2018, Potter County Sheriff's Department Deputy Joshua Newlun was in a marked unit working routine patrol on I-40 in Potter County, Texas. At approximately 2:06 p.m., Deputy Newlun stopped a 2007 Ford Edge for speeding and following too closely at approximately MM 52. Upon making contact with the driver of the vehicle, who was later identified as Laryssa Marie BROWN, Deputy Newlun noticed indicators of possible criminal activity. Deputy Newlun noticed signs of nervousness. Deputy Newlun did speak to her about the details of the trip including the purpose and the destination. Deputy Newlun did also speak to the passenger, David Dwight HILLIARD Jr. about the details of the trip. He did also show visible signs of nervousness. There were inconsistencies in their stories.

4. Deputy Newlun did later ask BROWN for consent to search the vehicle, which she granted. Both suspects did tell Deputy Newlun that everything in the vehicle belonged to

them, and no one else had access to the vehicle to place things in the vehicle. While searching the vehicle Deputy Newlun located a paper shopping bag in the back seat that he had previously observed between the legs of HILLIARD when they were first stopped. Inside the bag was a white box. When removing the box Deputy Newlun noticed it to be heavy. Inside the box Deputy Newlun located four vacuum sealed bags of a blue crystal substance, and 2 vacuum sealed bags of an off white crystal substance, all of which is believed to be methamphetamine. One of the bags of blue crystals was field tested, and did give a positive indicator for the presence of methamphetamine, with a total gross weight of 2.9 kilograms. This quantity of narcotics is consistent with distribution, as opposed to someone's personal use. The suspects and the vehicle were transported to the Potter County Barn for processing.

5. DEA Task Force Officer Chris Walters and Task Force Officer Jose Barron did respond to the Potter County Barn. Both suspects were interviewed separately, with BROWN being interviewed first. TFO Walters did read BROWN her *Miranda* warnings which she stated she understood, and agreed to speak to agents. BROWN said she did not have a lot of details that could help her. BROWN said she doesn't know as much as we think she knows. A short time later BROWN stated she wanted a lawyer. The interview was then terminated and the recorder was turned off. BROWN was told we were going to interview HILLIARD. BROWN was told that if she changed her mind and wanted to speak to Agents again to let us know. BROWN said she didn't know how she could help, that she was just supposed to take it to her home and they would get it later. BROWN was escorted back to the bay area of the barn so Agents could interview HILLIARD.

6. TFO Walters and TFO Barron then interviewed HILLIARD. TFO Walters did read HILLIARD his *Miranda* warnings which he stated he understood, and agreed to speak to agents. HILLIARD was very quiet and did not answer several of the questions TFO asked him. HILLIARD said he has no information. HILLIARD asked where the stuff was going and he said not with him.

7. Based upon the foregoing, there is probable cause to believe Laryssa Marie BROWN and David Dwight HILLIARD Jr did knowingly and intentionally possessed with the intent to distribute 500 grams or more of a mixture and substance containing a

detectable amount of methamphetamine, a Schedule I controlled substances in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).


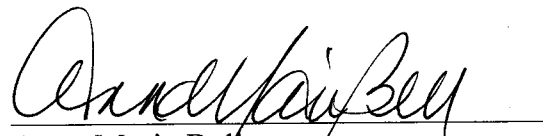


Chris Walters
DEA Task Force Officer

Sworn to before me, and subscribed in my presence

11-20-18 at Amarillo, Texas
Date City and State

Lee Ann Reno, U.S. Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial Officer
Anna Marie Bell
Assistant United States Attorney